

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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TROOPER 1,	:	
	:	Case No.: 22-cv-00893 (LDH)(TAM)
Plaintiff,	:	
	:	
v.	:	
	:	
NEW YORK STATE POLICE, ANDREW	:	
CUOMO, MELISSA DEROSA and	:	
RICHARD AZZOPARDI,	:	
	:	
Defendants.	:	
-----X	:	

**DECLARATION OF VALDI LICUL IN SUPPORT OF PLAINTIFF'S
MOTION TO QUASH SUBPOENAS**

I, Valdi Licul, pursuant to 28 U.S.C. § 1746, declare and state as follows:

1. I am a member of the bar of this Court and a Partner at the law firm Wigdor LLP, attorneys for Plaintiff Trooper 1 in the above-captioned matter.
2. Attached hereto as **Exhibit 1** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to Lindsey Boylan.
3. Attached hereto as **Exhibit 2** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to Charlotte Bennett.
4. Attached hereto as **Exhibit 3** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to Hamilton College.
5. Attached hereto as **Exhibit 4** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to Howard Zemsky.
6. Attached hereto as **Exhibit 5** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to "Lindsey For New York."

7. Attached hereto as **Exhibit 6** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to the Office of the Governor of New York State (the Executive Chamber).

8. Attached hereto as **Exhibit 7** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to Verizon.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of Defendant Andrew Cuomo's subpoena to Cade Leebron.

10. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: June 30, 2023
New York, New York

By: _____
Valdi Licul